

AB:ADG

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

PRE-ARRAIGNMENT  
COMPLAINT

- against -

WILLISZA DOUGLAS,

(T. 21, U.S.C., §§ 952(a), 960(a)(1) and  
960(b)(2)(B)(ii))

Defendant.

No. 19-MJ-711

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EASTERN DISTRICT OF NEW YORK, SS:

ROBERT D. DUNN, being duly sworn, deposes and states that he is a Special Agent with the U.S. Homeland Security, Homeland Security Investigations (“HSI”), duly appointed according to law and acting as such.

On or about August 6, 2019, within the Eastern District of New York and elsewhere, the defendant WILLISZA DOUGLAS did knowingly and intentionally import controlled substances into the United States from a place outside thereof, which offense involved substances containing cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Sections 952(a), 960(a)(1) and 960(b)(2)(B)(ii))

The source of your deponent’s information and the grounds for his belief are as follows:<sup>1</sup>

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<sup>1</sup> Because the purpose of this complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

1. On or about August 6, 2019, the defendant WILLISZA DOUGLAS arrived at John F. Kennedy International Airport in Queens, New York, (“JFK Airport”) aboard Caribbean Airlines flight number BW 526 from Georgetown, Guyana.

2. Upon her arrival, the defendant WILLISZA DOUGLAS was selected for an enforcement examination by United States Customs and Border Protection (“CBP”) officers. DOUGLAS presented one hard side purple carry-on bag and a brown purse. A CBP officer conducted a search of the carry-on bag, which was negative.

3. During the baggage examination, the defendant WILLISZA DOUGLAS made inconsistent statements. Specifically, she first stated that she was visiting her sister, but later stated that she was coming for a family reunion. DOUGLAS appeared nervous. Among other physical indicators, she was not making eye contact and fidgeted. CBP officers conducted a pat down and felt a hard object in the groin area. DOUGLAS first denied knowing what the object was, but later admitted that it was narcotics, although she claimed not to know what type of narcotics.

4. The defendant WILLISZA DOUGLAS was presented with an x-ray consent form. DOUGLAS indicated that she understood and signed the form. DOUGLAS further admitted that she had inserted pellets into her rectum. DOUGLAS voluntarily removed the vaginal insert under the supervision of a doctor at the doctor’s request for a urine test for pregnancy prior to the X-ray. The vaginal insert contained a total of 46 pellets. One of the pellets was probed and found to contain a substance that field-tested positive for cocaine.

5. As of the date and time of the filing of this complaint, the defendant WILLISZA DOUGLAS has passed approximately 18 pellets of those that remain secreted

inside her body. One of the pellets was probed and found to contain a substance that field-tested positive for cocaine.

6. The defendant WILLISZA DOUGLAS will be detained at the JFK Airport medical facility until such time as she has passed all the pellets contained within her intestinal tract.

WHEREFORE, your deponent respectfully requests that the defendant WILLISZA DOUGLAS be dealt with according to law.



ROBERT D. DUNN  
Agent  
Homeland Security Investigations

Sworn to before me this  
7th day of August, 2019

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THE HONORABLE SANKET J. BULSARA  
UNITED STATES MAGISTRATE JUDGE  
EASTERN DISTRICT OF NEW YORK